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11 **UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF NEVADA**

13 \*\*\*\*

14 SUSAN HALL, an Individual, Case No. 2:22-cv-00211-RFB-EJY  
15 Plaintiff,  
16 v.  
17 GEICO ADVANTAGE INSURANCE  
18 COMPANY, a foreign corporation; DOES I  
19 through X, inclusive; and ROE BUSINESS  
20 ENTITIES I through X, inclusive,  
Defendants.

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**STIPULATION AND PROPOSED ORDER  
TO EXTEND TIME TO RESPOND TO  
PLAINTIFF'S COMPLAINT  
(FIRST REQUEST)**

Defendant GEICO Advantage Insurance Company ("GEICO") and Plaintiff Susan Hall ("Plaintiff"), by and through their counsel or record, hereby stipulate and agree as follows:

**WHEREAS**, on January 5, 2022, Plaintiff filed her Complaint in the Eighth Judicial District Court, Case No. A-22-846266-C [ECF No. 1-1];

**WHEREAS**, on February 4, 2022, GEICO filed a Petition for Removal to this Court [ECF No. 1];

**WHEREAS**, GEICO's time to file responsive pleadings has not yet expired;

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1           **WHEREAS**, as the parties are engaged in settlement discussions, GEICO requested an  
2 extension to its responsive pleading deadline;

3           **NOW THEREFORE**, the Parties, by and through their undersigned counsel, hereby  
4 stipulate and agree as follows:

5           1.       GEICO's deadline to file a responsive pleading will be extended by ten (10) days,  
6 and will now be February 21, 2022.

7           **IT IS SO STIPULATED.**

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9           Dated: February 11<sup>th</sup>, 2022

McCORMICK, BARSTOW, SHEPPARD,  
WAYTE & CARRUTH LLP

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11           By: /s/ Jonathan W. Carlson  
12                   Jonathan W. Carlson  
13                   Nevada Bar No. 10536  
14                   Frank A Toddre, II  
15                   Nevada Bar No. 11474  
16                   Stacy Norris  
17                   Nevada Bar No. 15445  
18                   Attorneys for Defendant GEICO

19           Dated: February 11<sup>th</sup>, 2022

BERTOLDO BAKER CARTER SMITH & CULLEN

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21           By: /s/ Brett A. Carter  
22                   Brett A. Carter, Esq.  
23                   Nevada Bar No. 5904  
24                   Attorney for Plaintiff

25           **IT IS SO ORDERED:**

26           Dated this 11th day of February, 2022

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28           By: Elayna J. Youchah  
29                   Elayna J. Youchah  
30                   United States Magistrate Judge

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